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Michael O. Leavitt
Governor
Kathleen Clarke
Executive Director
Lowell P. Braxton
Division Director

1594 West North Temple, Suite 1210 PO Box 145801 Salt Lake City, Utah 84114-5801 801-538-5340 801-359-3940 (Fax)

May 1, 2001

TO:

FROM:

Wayne H. Western, Senior Reclamation Analysis  $\mathcal{W} \mathcal{H} \mathcal{W}$ 

RE:

Permit and Disturbed Area Boundary Maps, Canyon Fuel Company, LLC,

SUFCO Mine: -AM01A-1

### **SUMMARY:**

On February 20, 2001, the Division received AM01A for the SUFCO Mine. The amendment revised, corrected and clarified the permit and disturbed acreage, and boundaries. In addition to the revised text and Plate 5-6, the permittee also included a copy of Plate 5-6 in an AutoCAD file. The Division reviewed the text and maps. The Division needed clarification on why the road and underground utilities between the main mine site and the water tank site were not included in the disturbed area. In addition the Division needed clarification on the location of the waste rock site on the permit area map. On April 25, 2001, the Division received a modified submital that addressed those issues.

## **TECHNICAL ANALYSIS:**

# **OPERATION PLAN**

## MINING OPERATIONS AND FACILITIES

Regulatory Reference: 30 CFR 784.2, 784.11; R645-301-231, -301-526, -301-528.

#### **Analysis:**

#### General

Amendment AM01A revised, corrected and clarified the permit and disturbed acreage, and boundaries. Those modifications to the text are as follows:

#### **TECHNICAL MEMO**

- An unnamed table on page 1-37 that list the acreage in the disturbed areas, the actual acreage that has been disturbed and the site description.
- Acreage at the waste rock site on page 2-8 and 4-2.
- Waterlines and cables are buried beside the U.S.F.S. public stock trail were installed prior to August 3, 1977 as part of a USFS special use permit. The utilities will be left in place when no longer needed because removing the utilities would cause need less disturbance. The Division does allow buried utility to remain in place if they will not cause health, safety, or environmental problems and removing the utility would cause unneeded disturbance.

The information in the revised text shows each disturbed area within the permit boundaries and the acreage. The Division used the AutoCAD file to verify the disturbed acreage. There were minor differences between the acreage listed on page 1-37 and the area calculated by AutoCAD. The Division assumes that part of the problem could be that the areas on Plate 5-6 were digitized from other maps that were used for area calculations. The Division does not consider the differences to be significant at this time. For consistency the Division will consider the acreage list on page 1-37 to be official acreage. The Division will verify the location of the disturbed area boundaries and acreage using a GPS system at a later time.

#### Findings:

The requirements of this section of the regulations are considered adequate in regards to the proposed permit change.

# MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323. **Analysis:** 

## Affected area maps

The permittee revised the Plate 5-6 to show the location of all permit and disturbed area boundaries for the SUFCo mine including the waste rock site. The Division reviewed the map and an AutoCAD file found that they were adequate.

#### **TECHNICAL MEMO**

# Findings:

The requirements of this section of the regulations are considered adequate in regards to the proposed permit change.

## **RECOMMENDATION:**

The Division should approve the amendment.

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